

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v

Case No. 11-20129

HOWARD JOSEPH QUANT, D-23,

Hon. Robert H. Cleland

Defendant.

BARBARA L. McQUADE (P45423)
United States Attorney

MICHAEL J. MCCARTHY, P.C.
Michael J. McCarthy (P30169)
Attorney for Defendant
26001 Five Mile Road
Redford, MI 48239
(313) 535-1300

REQUESTS AND NOTICES IN
COMPLIANCE WITH STANDING
ORDER FOR DISCOVERY AND INSPECTION

NOW COMES the Defendant, Howard Joseph Quant D-23, by and through his attorney, Michael J. McCarthy (P30169), who in compliance with the Standing Order for Discovery and Inspection entered in this case provides the Government with the following requests and notices:

1. It is hereby requested that the Government provide copies or an opportunity to make copies of:

- a) Any information within the meaning of the "Standing Order", Paragraph No. 1(a) or Rule 16(a)(1) of the Federal Rules of Criminal Procedure.

- b) A written summary of the expert testimony the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case in chief at trial. This summary must describe the witnesses' opinions, the basis and the reasons therefore, and the witnesses' qualifications. Rule 16(a)(1)(G).
 - c) Any exculpatory evidence within the meaning of the "Standing Order", Paragraph No. 1(b) and/or *Brady v Maryland*, 373 U.S. 83 (1963), and *United States v Agurs*, 427 U.S. 97 (1976).
 - d) Any document which will be used to refresh the memory of a witness within the meaning of the "Standing Order", Paragraph No. 8 and/or Rule 612 of the Federal Rules of Evidence.
 - e) Any statement by persons who have possible knowledge or information relative to this case which are not protected from disclosure by 18 U.S.C. §3500.
 - f) Any statement of witnesses within the meaning of 18 U.S.C. §3500(e).
- 2. Notice is hereby given pursuant to the "Standing Order", Paragraph No. 5(b), that the foundation for any and all exhibits will be contested.
 - 3. Notice is hereby given pursuant to the "Standing Order", Paragraph No. 6, that the chain of custody of any and all exhibits will be contested.
 - 4. Notice is hereby given pursuant to the "Standing Order", Paragraph No. 7, that any scientific analysis or summary testimony by experts will be contested unless there has been a proper basis for the witness' testimony under Rule 1006 of the Federal Rules of Evidence.

5. All requests for information, materials or evidence contained hereby are continuing and the government is expected to immediately provide any additional information, materials or evidence as required by the "Standing Order", Paragraph No. 3, and/or Rule 16(c) of the Federal Rules of Criminal Procedure.
6. Notices contained herein will remain in effect unless expressly withdrawn.

MICHAEL J. McCARTHY, P.C.

July 24, 2012

/s/ Michael J. McCarthy
Michael J. McCarthy (P30169)
Attorney for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2012, I electronically filed the foregoing document with the Clerk of the Court using ECF system which will send notification of such filing to all parties of record.

July 24, 2012

/s/ Michael J. McCarthy
Michael J. McCarthy (P30169)
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